

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:

PAUL J. FOLKMAN AND
HSUEH MEI FOLKMAN,

Debtors.

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JEFFREY BLANCHARD and
JANINE BLANCHARD,

Plaintiffs,

v.

PAUL J. FOLKMAN and HSUEH MEI
FOLKMAN a/k/a MICHELLE FOLKMAN
a/k/a HSUEH MEI LEE, individually,
FOLKMAN DEVELOPMENT
CORPORATION, NRT NEW ENGLAND
LLC d/b/a COLDWELL BANKER
RESIDENTIAL BROKERAGE and
BROOKDALE CORPORATION,

Defendants.

Case No. 20-40864-btr-7

Chapter 7

Adversary Case No. 20-04083-btr

STIPULATED TO MOTION TO AMEND SCHEDULING ORDER ARISING FROM
INITIAL MANGEMENT CONFERENCE
(All Parties)

NOW COME all Parties in the above-captioned adversary proceeding and move this Honorable Court to allow this *Motion* and:

- GRANT an extension of all discovery-related deadlines.

AS REASONS THEREFOR, the Parties state:

Additional time is required to finalize expert disclosures and respond to outstanding discovery requests. Moreover, further discovery is anticipated and expected. Following

conference, counsel for all Parties agree and stipulate to amend Section 2 of the *Scheduling Order Arising from Initial Management Conference* as follows:

1. Strike from Section 2, subsection F. Disclosures of Expert Testimony, the portion which states, “on or before Friday, September 15, 2023,” and insert in its place: **on or before Tuesday, October 31, 2023.**
2. Strike from Section 2, subsection H. Discovery Deadline, the portion which states, “on or before Tuesday, October 31, 2023,” and insert in its place: **on or before Thursday, November 30, 2023.**

And further, the additional time will permit all counsel the opportunity to direct resources to settlement negotiations.

WHEREFORE, all Parties respectfully request that this Honorable Court GRANT extensions to discovery deadlines as specified above.

Respectfully submitted,
Plaintiffs,

Jeffrey and Janine Blanchard,

By their attorney,

/s/ Michael G. Franzoi

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Respectfully submitted,
Defendants,

Paul J. and Hsueh Mei Folkman and
Folkman Development Corporation

By their attorney,

/s/ Robert A. Miller

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Respectfully submitted,
Defendant,

NRT New England, LLC d/b/a,
Coldwell Banker Residential Brokerage

By its attorneys,

/s/ Michael C. Farmer, Jr.

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Dated: September 19, 2023

CERTIFICATE OF SERVICE

This is to certify that, on September 19, 2023, a true and correct copy of the foregoing document has been served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case.

/s/ Michael G. Franzoi

Michael G. Franzoi